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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

NOV 14 2002

at 12 o'clock and 14 p.m.
WALTER A. Y. H. CHIN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

LAVERNE K. KLEIN,)

Defendant.)

CR. NO.

INDICTMENT

[18 U.S.C. §§ 371, 472]

CR 02-00476 DAE

INDICTMENT

COUNT 1

The Grand Jury charges:

From a precise date unknown to the Grand Jury, but by in and about November, 2001, and continuing to in and about February, 2002, in the District of Hawaii, LAVERNE K. KLEIN, defendant herein, did willfully and knowingly conspire with Christopher K. to commit an offense against the United States, that is, to knowingly possess, pass, utter and publish falsely

made, forged and counterfeited obligations of the United States, with intent to defraud, in violation of Title 18, United States Code, section 472.

WAYS AND MEANS OF THE CONSPIRACY

Christopher K. manufactured the counterfeited bills on a color copier at his workplace. Defendant LAVERNE K. KLEIN then assisted him in cutting and bundling the bills. They then took the bills to various retail stores in Hawaii and used them to purchase merchandise.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, defendant LAVERNE K. KLEIN and Christopher K. committed various overt acts in the District of Hawaii, including, but not limited to, the following:

1. In or about November or December, 2001, Christopher K. and defendant LAVERNE K. KLEIN went to McDonald's restaurant at Pearlridge shopping center, where Christopher K. used a counterfeited \$100 bill.

2. In or about November or December, 2001, Christopher K. and defendant LAVERNE K. KLEIN went to McDonald's restaurant at the Navy Exchange in Moanalua Shopping Center, where Christopher K. used a counterfeited \$100 bill.

3. In or about November or December, 2001, defendant LAVERNE K. KLEIN went to a bookstore in Windward Mall, where she used a counterfeited \$100 bill.

4. In or about November or December, 2001, defendant LAVERNE K. KLEIN went to a swap meet at Aloha Stadium, where she used a counterfeited \$100 bill.

All in violation of Title 18, United States Code, section 371.

COUNT 2

The Grand Jury further charges:

In or about November or December, 2001, at a bookstore in Windward Mall, in the District of Hawaii, defendant LAVERNE K. KLEIN did knowingly, and with intent to defraud, pass, utter and publish a falsely made, forged and counterfeited obligation of the United States, that is, a counterfeited one-hundred dollar (\$100) Federal Reserve Note, with defendant then and there knowing said obligation was falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Section 472.

COUNT 3

The Grand Jury further charges:

In or about November or December, 2001, at a swap meet at Aloha Stadium, in the District of Hawaii, defendant LAVERNE K.

KLEIN did knowingly, and with intent to defraud, pass, utter and publish a falsely made, forged and counterfeited obligation of the United States, that is, a counterfeited one-hundred dollar (\$100) Federal Reserve Note, with defendant then and there knowing said obligation was falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Section 472.

COUNT 4

The Grand Jury further charges:

On or about January 17, 2002, in the District of Hawaii, defendant LAVERNE K. KLEIN did knowingly, and with intent to defraud, possess and conceal a falsely made, forged and counterfeited obligation of the United States, that is, a counterfeited one-hundred dollar (\$100) Federal Reserve Note, with defendant then and there knowing said obligation was falsely

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made, forged and counterfeited.

In violation of Title 18, United States Code, Section 472.

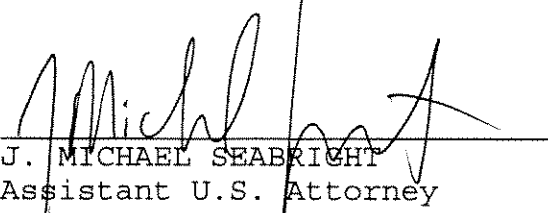
DATED: November 17, 2002, at Honolulu, Hawaii.

A TRUE BILL

751

FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii



J. MICHAEL SEABRIGHT
Assistant U.S. Attorney



MARK E. RECKTENWALD
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UNITED STATES OF AMERICA vs. LAVERNE K. KLEIN
"Indictment" _____